

**IN THE UNITED STATES DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**LORENZO BYRD**, on behalf of  
**TOMMY L. BYRD**, an incompetent  
adult,

Plaintiff,

vs.

**UNITED STATES OF AMERICA**,

Defendant.

**NO. 1:20-CV-03090-LMM**

**NOTICE OF DEPOSITION OF DR. MARY ELIZABETH JENSEN**

Pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant serves this notice, by and through counsel for Dr. Mary Elizabeth Jensen, of the oral and videotaped deposition of the following witness at the time and place stated below for use in this action, including in any dispositive motions and at trial.

Witness: Dr. Mary Elizabeth Jensen

Date: June 7, 2021

Time: 1:00 pm EST

Location: This deposition will be taken remotely. The witness's location shall be the location of the deposition (VA). See Fed. R. Civ. P.

30(b)(4). The Court Reporter will contact the parties with the technical details of connecting to the remote deposition.

Court Reporter: Esquire

Videographer: Esquire via Zoom

The deposition will continue from day to day until completed, with such breaks, as necessary. A request to produce documents permitted under Rule 30(b)(2) is attached as Exhibit A.

Respectfully submitted April 30, 2021.

KURT R. ERSKINE  
*Acting United States Attorney*

/s/ Trishanda L. Treadwell  
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*Assistant United States Attorney*  
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**Certificate of Service**

I certify that I have electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will automatically send email notification of such filing to attorneys of record.

April 30, 2021

*/s/ Trishanda L. Treadwell*

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TRISHANDA L. TREADWELL  
*Assistant United States Attorney*

## **EXHIBIT A**

Under Fed. R. Civ. P. 34(b)(2), you are commanded to attend and testify at the above specified time and place; you are commanded to produce the below designated documents, electronically stored information, or tangible things in your possession, custody, or control. The following requests do not seek any communication to or from your legal counsel. Please produce a true and correct physical copy of the following at the deposition or before. This is not intended to duplicate documents that have already been produced in this case. This request is only intended to capture additional documents not yet produced that are responsive. All requests and terms used below should be read as having the same meaning that Plaintiff intended in his deposition notices.

1. Your complete file concerning this lawsuit, including documents or other evidence reviewed by you concerning this lawsuit, in preparation for your deposition testimony, or in the course of your evaluation, review, and formation of opinions regarding the care of Mr. Tommy Byrd at the Atlanta VAMC in November 2016.
2. Reports, letters, affidavits, declarations, statements, or other documents you have authored or contributed to concerning this case.
3. Documents or other evidence, in your possession or provided to you, containing facts, data, or assumptions concerning this case.
4. Your current resume or curriculum vitae.

5. Records, personal notes, calendars, diaries, phone logs and any other type of document (whether electronic, handwritten, or otherwise) concerning any fact, opinion, or belief in relation to this lawsuit.
6. Documents, emails, text messages, memoranda, telephone memos, notes, logs or any other type of material reflecting or documenting any correspondence, communication, or contact between you and any person related to this lawsuit.
7. Electronic or computerized documents, information, calculations, data, database searches, recordings, images, or transmissions reviewed, used, referred to, or relied upon by you or related to your evaluation, review, and opinions formed regarding this case.
8. Exhibits or proposed exhibits, including charts, diagrams, PowerPoints, illustrations, or other demonstrative aids, that have been furnished to you, reviewed by you, or prepared or proposed by you in connection with this lawsuit.
9. Photographs, recordings, videotapes, or radiographic films provided to you, or reviewed, used, referred to, or relied upon by you or related to your evaluation, review, and opinions formed regarding this case.
10. Papers, abstracts, or other scientific articles, journals, or textbooks authored, in whole or in part, by you related to your evaluation, review, and opinions formed regarding this case.
11. Papers, abstracts, or other scientific articles, journals, or textbooks that were provided to you, or that you reviewed, or are related to your evaluation, review, and opinions formed regarding this case, or that you intend to use at trial.
12. Records, personal notes, calendars, diaries, phone logs and any other type of document (whether electronic, handwritten or otherwise) concerning any facts related to this lawsuit.